

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

CLASS ACTION

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF THE PROPOSED CLASS SETTLEMENT AND PLAN OF ALLOCATION**

Her Majesty The Queen In Right Of Alberta (“Alberta”) and the Fresno County Employees’ Retirement Association (“Fresno,” and together with Alberta, “Lead Plaintiffs”), by and through their undersigned counsel of record, respectfully move this Court for final approval of the proposed Settlement and the Plan of Allocation. The specific terms of the Settlement are set forth in the Stipulation And Agreement Of Settlement (the “Stipulation”), which was previously filed with the Court (ECF No. 196-1).

This Motion is made pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, and the Court’s Amended Order Preliminarily Approving Settlement And Providing For Notice, dated April 18, 2016 (ECF No. 201). The Court scheduled a hearing on this Motion for July 20, 2016, at 2:00 p.m.

This Motion is supported by the accompanying Memorandum Of Law In Support Of Lead Plaintiffs’ Motion For Final Approval Of The Proposed Class Settlement And Plan Of Allocation, the Joint Declaration Of Susan R. Podolsky, Joseph A. Fonti, And David R. Stickney In Support Of Proposed Class Settlement, Plan Of Allocation And Award Of Attorneys’ Fees And Expenses

and the exhibits thereto, the record and proceedings in this Action, and such other matters the Court may consider at the time of the hearing.

Lead Plaintiffs will submit for the Court's consideration a form of proposed Order approving the Plan of Allocation and the Parties' agreed-upon form of the proposed Judgment (including a list of opt-outs) when they file their reply papers on or before June 29, 2016.

Dated: June 8, 2016

Respectfully submitted,

/s/ Susan R. Podolsky

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CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

DATED: June 8, 2016

/s/ Susan R. Podolsky

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